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## BEFORE THE POSTAL RATE COMMISSION

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NOTICE BY UNITED PARCEL SERVICE OF INTERVENTION AS A LIMITED PARTICIPATOR UNDER COMMISSION RULE 20a (July 29, 1998)

> John E. McKeever Attorney for United Parcel Service

Service should be made by hard copy in accordance with Rules of Practice 9-12 upon:

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E-MAIL: Ishepherd@corpmail.ups.com.

## BEFORE THE POSTAL RATE COMMISSION

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NOTICE BY UNITED PARCEL SERVICE OF INTERVENTION AS A LIMITED PARTICIPATOR UNDER COMMISSION RULE 20a

Pursuant to Rule 20a of the Commission's Rules of Practice, 39 C.F.R. § 3001.20a, United Parcel Service ("UPS") hereby gives notice of its intervention as a limited participator in this proceeding and states the following in support of its intervention:

- 1. UPS provides delivery services throughout the United States via air and ground operations. UPS also provides international delivery services.
- 2. UPS competes with the United States Postal Service and is concerned about and affected by the application of the Postal Reorganization Act of 1970, as amended, 39 U.S.C. § 101 et seq., in all areas where the Postal Service competes with private enterprise, including UPS. These areas include parcel delivery services as well as ancillary services which are often purchased along with the basic delivery service.
- UPS is also a substantial user of postal services, especially First
  Class Mail.

4. As a competitor of the Postal Service and as a user of postal services, UPS will be affected by and is interested in the changes in the classifications and rates proposed by the Postal Service in this proceeding. In particular, UPS is concerned that any changes in these classifications and rates comply with the Postal Reorganization Act, including the factors set forth in Sections 2622 and 3623 of the Act.

WHEREFORE, United Parcel Service gives notice of its intervention as a limited participator in this proceeding.

Respectfully submitted,

John E. McKeever

Attorney for United Parcel Service

PIPER & MARBURY L.L.P. 3400 Two Logan Square 18th and Arch Streets Philadelphia, PA 19103 (215) 656-3300

and

1200 19th Street, N.W. Washington, DC 20036 (202) 861-3900

Of Counsel

Dated: July 29, 1998

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

John E. McKeever

Dated: July 29, 1998 Philadelphia, PA